

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

Chapter 9

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

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**RESPONSE TO ORDER REQUIRING IDENTIFICATION  
OF LEGAL ISSUES RELATING TO CONFIRMATION**

The Official Committee of Retirees of the City of Detroit, Michigan ("Committee"), the Retired Detroit Police & Fire Fighters Association ("RDPFFA"), Donald Taylor, individually and as President of the RDPFFA, the Detroit Retired City Employees Association ("DRCEA"), and Shirley V. Lightsey, individually and as President of the DRCEA (collectively "Retiree Association Parties") hereby submit their response to the Court's *Order Regarding Identifying Legal Issues Relating to Confirmation* ("Order") (Dkt. No. 5021). The parties to this Response are collectively referred to herein as Retiree Respondents.

The Order requires the City and any objectors to the City's proposed Plan to identify legal issues relating to confirmation. Based on the statements made to and by the Court at the hearing on May 21, 2014, and the fact that none of the Retiree

Respondents is objecting to the proposed Plan at this time, the Order does not require them to make a filing at this time.

However, before the Court decides any of the legal issues that are raised by the Objectors and/or the City, the Retiree Respondents request that they be given an opportunity to address those issues. Because of their unique procedural posture, it is possible that the Retiree Respondents will not know whether they will be objecting to the Plan or supporting it until June 20, when they will be filing objections to the Plan if funding commitments are not made, or July 16, when voting on the Plan is completed. Thus, the Retiree Respondents request the Court to reserve making any decision on the classification or underlying substantive issues identified by the Objectors and/or City until sometime sufficiently after June 20 or July 16, to allow the Retiree Respondents to address those issues.

Dated: May 27, 2014

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